

**BEFORE THE
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Statement of Issues
Against:

NICOLE MARY RENEE HOWARD

Applicant for Registered Nurse License

Respondent

Case No. 2012-3

OAH No. 2012080572

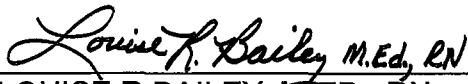
**ORDER CORRECTING CLERICAL ERROR IN
"PROBATION CONDITION NUMBER 11 COST RECOVERY"**

On its own motion, the Department of Consumer Affairs, Board of Registered Nursing (hereafter "Board") finds that there is a clerical error in "the cost recovery amount" in the Decision and Order in the above-entitled matter and that such clerical error should be corrected so that the decision reflects the correct amount.

IT IS HEREBY ORDERED that the cost recovery amount contained in the Order in the above-entitled matter be and is hereby amended and corrected nunc pro tunc and the probation condition number 11 (Cost Recovery) reads as follows:

"Respondent shall pay to the Board costs associated with its investigation and enforcement pursuant to Business and Professions Code Section 125.3 in the amount of \$0."

IT IS SO ORDERED this 27th day of February 2013.



LOUISE R BAILEY, M.ED., RN
EXECUTIVE OFFICER
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

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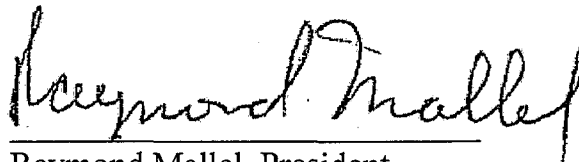
OAH No. 2012080572

DECISION

The attached proposed decision of the Administrative Law Judge is hereby adopted by the Board of Registered Nursing as its Decision in the above-entitled matter.

This Decision shall become effective on March 22, 2013.

IT IS SO ORDERED this 22nd day of February 2013.



Raymond Mallel, President
Board of Registered Nursing
Department of Consumer Affairs
State of California

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Statement of Issues
Against:

NICOLE MARY RENEE HOWARD,

Applicant.

Case No. 2012-3

OAH No. 2012080572

PROPOSED DECISION

Administrative Law Judge Ruth S. Astle, State of California, Office of Administrative Hearings, heard this matter in Oakland, California, on November 13, 2012.

Char Sachson, Deputy Attorney General and Rosailda Perez, Legal Intern, represented complainant.

Respondent was present and represented herself.

The matter was submitted on November 13, 2012.

FACTUAL FINDINGS

1. Louise R. Bailey, M.Ed., R.N., made the statement of issues in her official capacity as the Executive Officer of the Board of Registered Nursing, Department of Consumer Affairs.
2. On July 26, 2011, the Board received an application for a Registered Nursing License from Nicole Mary Renee Howard certified under penalty of perjury. The Board denied the application of January 25, 2012.
3. On March 13, 2000, in a criminal proceeding in Alameda County Superior Court, applicant was convicted of driving on a suspended license (Vehicle Code section 14601.1, subdivision (a).) Applicant was sentenced to three years court probation and fined \$946. This conviction is not substantially related to the duties, qualifications, and functions of a registered nurse and cannot be the basis, alone, for denial of the application.

4. On September 12, 2000, in the United States District Court for the Northern District of California, applicant was convicted of violating Title 18 U.S.C. section 1029(a)(3) (access device fraud). Applicant was sentenced to 12 months imprisonment, supervised release for three years, 100 hours of community service, and ordered to pay restitution in the amount of \$189,458.83. The circumstances of the conviction are that while employed by Wells Fargo, applicant accessed, provided and compromised account information of about 66 Wells Fargo customers to an unauthorized third party. This conviction involves dishonesty, and is substantially related to the duties, qualifications, and functions of a registered nurse.

5. On March 11, 2005, in the Superior Court of Marin County, California, applicant was convicted of violating Penal Code section 508 (felony embezzlement). Applicant was sentenced to three years imprisonment (suspended), supervised probation for five years, and ordered to pay restitution in the amount of \$16,928.25 to Marin General Hospital, and a restitution fine in the amount of \$1,640. Applicant failed to comply with the terms of her probation and was imprisoned for 363 days on January 30, 2008. The circumstances of the conviction are that applicant was employed by Marin General Hospital as a staffer in June 2000. Applicant gained access to the hospital computer, assigned herself overtime shifts, and was paid for working the extra shifts when she in fact did not work the extra shifts. This conviction involves dishonesty and is substantially related to the duties, qualifications and functions of a registered nurse.

6. On September 29, 2009, in the Superior Court of Solano County, California, applicant was convicted of driving without a license in violation of Vehicle Code section 12500, subdivision (a). Applicant was fined \$380. Applicant is working towards getting her license restored. This conviction is not substantially related to the duties, qualifications, and function of a registered nurse and cannot be the basis, alone, for denial of the application.

7. Respondent had a "rough start" in life, working as a night club dancer and finding herself exposed to criminal activity. She was "caught" and cooperated with authorities to apprehend the master mind of the criminal scheme.

8. Respondent then was employed by Marin General Hospital and going to school. She was having difficulty making ends meet, so she lied on her time card. She got caught again. She got behind paying her court ordered restitution and was remanded into custody for violating the conditions of her probation. This was a wake up call for respondent. She spent eight months and 27 days in custody. She decided she needed to change her life. She completed probation and paid restitution in full.

9. Respondent is presently employed at San Ramon Regional Medical Center as a unit secretary/monitor technician. She has been employed there since 2009. Her employer knows about her convictions and is willing to supervise her. She has received excellent evaluations always meeting or exceeding standards. Respondent presented a letter from a registered nurse at the San Ramon Regional Medical Center. She finds respondent to be mature, responsible and intelligent. She highly recommends her to be a registered nurse.

10 Respondent completed nursing school at Contra Costa Community College in May 2011. She did very well in school. She received the Doctors Medical Center Nursing Award for academic achievement, outstanding clinical performance, and outstanding service. Her clinical supervisor wrote a letter of recommendation for respondent. She finds respondent to be a "natural" and to be moral and ethical in her nursing practices. She highly recommends respondent and hopes she is given a chance to obtain her license. Respondent also presented a letter from the Director of the Nursing Program at Contra Costa College. She has seen a change in respondent and finds her to be an excellent candidate for a nursing license. Respondent discussed her legal problems with her and she believes respondent has learned from her negative experiences.

11. Respondent presented a letter from Minister Marvin D. Saucer, a minister at her church. He finds respondent's character to be of high integrity, trustworthy and loving. Respondent relies on her pastor for guidance and for help dealing with problems when they arise. He is part of her support group.

12. Respondent also presented a character letter from Altrinise Grant who has known her for 11 years. Ms. Grant also finds respondent to be caring, sensitive and determined.

13. Respondent genuinely regrets the bad decisions that she has made in the past. She is extremely unlikely to repeat her criminal behavior. The Deputy Attorney General in the matter recommended a three year probationary license on standard terms and condition. That is a reasonable result in this case. Respondent has demonstrated sufficient rehabilitation to warrant a probationary license.

LEGAL CONCLUSIONS

1. By reason of the matters set forth in Finding 3, cause for denial does not exist pursuant to Business and Professions Code sections 2761, subdivisions (a) (unprofessional conduct) and/or (f) (conviction of a substantially related crime) and/or 480 (conviction of a substantially related crime). The conviction of driving on a suspended license is not unprofessional conduct or substantially related to the duties, qualifications, and functions of a registered nurse.

2. By reason of the matters set forth in Finding 4, cause for denial exists pursuant to Business and Professions Code sections 2761, subdivisions (a) (unprofessional conduct) and (f) (conviction of substantially related crimes) and 480 (conviction of a substantially related crime). Conviction of a crime involving dishonesty is substantially related to the duties, qualifications and functions of a registered nurse.

3. By reason of the matters set forth in Finding 5, cause for denial exists pursuant to Business and Professions Code sections 2761, subdivisions (a) (unprofessional conduct) and (f) (conviction of substantially related crimes) and 480 (conviction of a substantially

related crime). Conviction of a crime involving dishonesty is substantially related to the duties, qualifications and functions of a registered nurse.

4. By reason of the matters set forth in Finding 6, cause for denial does not exist pursuant to Business and Professions Code sections 2761, subdivisions (a) (unprofessional conduct) and/or (f) (conviction of a substantially related crime) and/or 480 (conviction of a substantially related crime). The conviction of driving without a license is not unprofessional conduct or substantially related to the duties, qualifications, and functions of a registered nurse.

5. The matters in extenuation, mitigation and rehabilitation set forth in Findings 7 through 13, have been considered in making the following order.

ORDER

IT IS HEREBY ORDERED that the application of respondent Nicole Mary Renee Howard for licensure is hereby granted. Upon successful completion of the licensure examination and all other licensing requirements, a license shall be issued to respondent. Said license shall immediately be revoked, the order of revocation stayed and respondent placed on probation for a period of three years on the following conditions:

SEVERABILITY CLAUSE – Each condition of probation contained herein is a separate and distinct condition. If any condition of this Order, or any application thereof, is declared unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other applications thereof, shall not be affected. Each condition of this Order shall separately be valid and enforceable to the fullest extent permitted by law.

(1) **OBEY ALL LAWS** - Respondent shall obey all federal, state and local laws. A full and detailed account of any and all violations of law shall be reported by the respondent to the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of compliance with this condition, respondent shall submit completed fingerprint forms and fingerprint fees within 45 days of the effective date of the decision, unless previously submitted as part of the licensure application process.

CRIMINAL COURT ORDERS: If respondent is under criminal court orders, including probation or parole, and the order is violated, this shall be deemed a violation of these probation conditions, and may result in the filing of an accusation and/or petition to revoke probation.

(2) **COMPLY WITH THE BOARD'S PROBATION PROGRAM** - Respondent shall fully comply with the conditions of the Probation Program established by the Board and cooperate with representatives of the Board in its monitoring and investigation of the respondent's compliance with the Board's Probation Program. Respondent shall inform the Board in writing within no more than 15 days of any address change and shall at all

times maintain an active, current license status with the Board, including during any period of suspension.

Upon successful completion of probation, respondent's license shall be fully restored (See condition 14).

(3) **REPORT IN PERSON** - Respondent, during the period of probation, shall appear in person at interviews/ meetings as directed by the Board or its designated representatives.

(4) **RESIDENCY, PRACTICE, OR LICENSURE OUTSIDE OF STATE** - Periods of residency or practice as a registered nurse outside of California shall not apply toward a reduction of this probation time period. Respondent's probation is tolled, if and when she resides outside of California. Respondent must provide written notice to the Board within 15 days of any change of residency or practice outside the state, and within 30 days prior to re-establishing residency or returning to practice in this state.

Respondent shall provide a list of all states and territories where she has ever been licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide information regarding the status of each license and any changes in such license status during the term of probation. Respondent shall inform the Board if she applies for or obtains a new nursing license during the term of probation.

(5) **SUBMIT WRITTEN REPORTS** - Respondent, during the period of probation, shall submit or cause to be submitted such written reports/declarations and verification of actions under penalty of perjury, as required by the Board. These reports/declarations shall contain statements relative to respondent's compliance with all the conditions of the Board's Probation Program. Respondent shall immediately execute all release of information forms as may be required by the Board or its representatives.

Respondent shall provide a copy of this decision to the nursing regulatory agency in every state and territory in which she has a registered nurse license.

(6) **FUNCTION AS A REGISTERED NURSE** - Respondent, during the period of probation, shall engage in the practice of registered nursing in California for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

For purposes of compliance with the section, "engage in the practice of registered nursing" may include, when approved by the Board, volunteer work as a registered nurse, or work in any non-direct patient care position that requires licensure as a registered nurse.

The Board may require that advanced practice nurses engage in advanced practice nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

If respondent has not complied with this condition during the probationary term, and respondent has presented sufficient documentation of her good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of the respondent's probation period up to one year without further hearing in order to comply with this condition. During the one year extension, all original conditions of probation shall apply.

(7) EMPLOYMENT APPROVAL AND REPORTING REQUIREMENTS -

Respondent shall obtain prior approval from the Board before commencing or continuing any employment, paid or voluntary, as a registered nurse. Respondent's present position at Camp Recovery Center is approved. Respondent shall cause to be submitted to the Board all performance evaluations and other employment related reports as a registered nurse upon request of the Board.

Respondent shall provide a copy of this decision to her employer and immediate supervisors prior to commencement of any nursing or other health care related employment.

In addition to the above, respondent shall notify the Board in writing within seventy-two (72) hours after she obtains any nursing or other health care related employment. Respondent shall notify the Board in writing within seventy-two (72) hours after she is terminated or separated, regardless of cause, from any nursing, or other health care related employment with a full explanation of the circumstances surrounding the termination or separation.

(8) SUPERVISION - Respondent shall obtain prior approval from the Board regarding respondent's level of supervision and/or collaboration before commencing or continuing any employment as a registered nurse, or education and training that includes patient care.

Respondent shall practice only under the direct supervision of a registered nurse in good standing (no current discipline) with the Board of Registered Nursing, unless alternative methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are approved.

Respondent's level of supervision and/or collaboration may include, but is not limited to the following:

- (a) Maximum - The individual providing supervision and/or collaboration is present in the patient care area or in any other work setting at all times.
- (b) Moderate - The individual providing supervision and/or collaboration is in the patient care unit or in any other work setting at least half the hours respondent works.
- (c) Minimum - The individual providing supervision and/or collaboration has person-to-person communication with respondent at least twice during each shift worked.

(d) Home Health Care - If respondent is approved to work in the home health care setting, the individual providing supervision and/or collaboration shall have person-to-person communication with respondent as required by the Board each work day. Respondent shall maintain telephone or other telecommunication contact with the individual providing supervision and/or collaboration as required by the Board during each work day. The individual providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to patients' homes visited by the respondent with or without respondent present.

(9) EMPLOYMENT LIMITATIONS - Respondent shall not work for a nurse's registry, in any private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse, or for an in-house nursing pool.

Respondent shall not work for a licensed home health agency as a visiting nurse unless the registered nursing supervision and other protections for home visits have been approved by the Board. Respondent shall not work in any other registered nursing occupation where home visits are required.

Respondent shall not work in any health care setting as a supervisor of registered nurses. The Board may additionally restrict respondent from supervising licensed vocational nurses and/or unlicensed assistive personnel on a case-by-case basis.

Respondent shall not work as a faculty member in an approved school of nursing or as an instructor in a Board approved continuing education program.

Respondent shall work only on a regularly assigned, identified and predetermined worksite(s) and shall not work in a float capacity.

If the respondent is working or intends to work in excess of 40 hours per week, the Board may request documentation to determine whether there should be restrictions on the hours of work.

(10) COMPLETE A NURSING COURSE(S) - Respondent, at her own expense, shall enroll and successfully complete a course(s) relevant to the practice of registered nursing no later than six months prior to the end of her probationary term.

Respondent shall obtain prior approval from the Board before enrolling in the course(s). Respondent shall submit to the Board the original transcripts or certificates of completion for the above required course(s). The Board shall return the original documents to respondent after photocopying them for its records.

(11) COST RECOVERY - Respondent shall pay to the Board costs associated with its investigation and enforcement pursuant to Business and Professions Code Section 125.3 in the amount of \$9,127. Respondent shall be permitted to pay these costs in a payment plan

approved by the Board, with payments to be completed no later than three months prior to the end of the probation term.

If respondent has not complied with this condition during the probationary term, and respondent has presented sufficient documentation of his or her good faith efforts to comply with this condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of the respondent's probation period up to one year without further hearing in order to comply with this condition. During the one year extension, all original conditions of probation will apply.

(12) VIOLATION OF PROBATION - If a respondent violates the conditions of her probation, the Board after giving the respondent notice and an opportunity to be heard, may set aside the stay order and impose the stayed discipline (revocation) of the respondent's license.

If during the period of probation, an accusation or petition to revoke probation has been filed against respondent's license or the Attorney General's Office has been requested to prepare an accusation or petition to revoke probation against the respondent's license, the probationary period shall automatically be extended and shall not expire until the accusation or petition has been acted upon by the Board.

(13) LICENSE SURRENDER - During respondent's term of probation, if she ceases practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of probation, respondent may surrender her license to the Board. The Board reserves the right to evaluate respondent's request and to exercise its discretion whether to grant the request, or to take any other action deemed appropriate and reasonable under the circumstances, without further hearing. Upon formal acceptance of the tendered license and wall certificate, respondent will no longer be subject to the conditions of probation.

Surrender of respondent's license shall be considered a disciplinary action and shall become a part of respondent's license history with the Board. A registered nurse whose license has been surrendered may petition the Board for reinstatement no sooner than the following minimum periods from the effective date of the disciplinary decision:

- 1) Two years for reinstatement of a license that was surrendered for any reason other than a mental or physical illness; or
- 2) One year for a license surrendered for a mental or physical illness.

(14) **SUCCESSFUL COMPLETION:** Upon successful completion of probation, respondent's license shall be fully restored.

DATED: 11/29/12

Ruth S. Astle

RUTH S. ASTLE

Administrative Law Judge

Office of Administrative Hearings

Exhibit A

Statement of Issues Case No. 2012-3

1 KAMALA D. HARRIS
Attorney General of California
2 FRANK H. PACOE
Supervising Deputy Attorney General
3 CHAR SACHSON
Deputy Attorney General
4 State Bar No. 161032
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 703-5558
6 Facsimile: (415) 703-5480
Attorneys for Complainant

7
8 **BEFORE THE**
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
9 **STATE OF CALIFORNIA**

10 In the Matter of the Statement of Issues
11 Against:

12 **NICOLE MARY RENEE HOWARD**

13 Applicant.

Case No. 2012-3

14 **STATEMENT OF ISSUES**

15 Complainant alleges:

16 **PARTIES**

17 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Statement of Issues solely in
18 her official capacity as the Interim Executive Officer of the Board of Registered Nursing,
19 Department of Consumer Affairs.

20 2. On or about July 26, 2011, the Board of Registered Nursing, Department of
21 Consumer Affairs received an application for a Registered Nursing License from Nicole Mary
22 Renee Howard (Applicant). On or about July 20, 2011, Nicole Mary Renee Howard certified
23 under penalty of perjury to the truthfulness of all statements, answers, and representations in the
24 application. The Board denied the application on January 25, 2012.

25 **JURISDICTION**

26 3. This Statement of Issues is brought before the Board of Registered Nursing (Board),
27 Department of Consumer Affairs, under the authority of the following laws. All section
28 references are to the Business and Professions Code unless otherwise indicated.

1 4. Section 2736 of the Code provides, in pertinent part, that the Board may deny a
2 license when it finds that the applicant has committed any acts constituting grounds for denial of
3 licensure under section 480 of that code.

4 5. Section 480(a) of the Business and Professions Code provides, in pertinent part, that a
5 board may deny a license if the applicant has been convicted of a crime substantially related to
6 the qualifications, functions or duties of the business or profession for which application is made,
7 has committed any act involving dishonesty, fraud or deceit, has committed any act which if done
8 by a licensee would be grounds for suspension or revocation of a license, or has knowingly made
9 a false statement of fact required to be revealed in the application.

10 6. Section 2761 of the Code states:

11 "The board may take disciplinary action against a certified or licensed nurse or deny an
12 application for a certificate or license for any of the following:

13 "(a) Unprofessional conduct, which includes, but is not limited to, the following:

14 ...

15 "(f) Conviction of a felony or of any offense substantially related to the qualifications,
16 functions, and duties of a registered nurse, in which event the record of the conviction shall be
17 conclusive evidence thereof.

18 ..."

19 7. Section 2765 of the Code states:

20 "A plea or verdict of guilty or a conviction following a plea of nolo contendere made to a
21 charge substantially related to the qualifications, functions and duties of a registered nurse is
22 deemed to be a conviction within the meaning of this article. The board may order the license or
23 certificate suspended or revoked, or may decline to issue a license or certificate, when the time
24 for appeal has elapsed, or the judgment of conviction has been affirmed on appeal or when an
25 order granting probation is made suspending the imposition of sentence, irrespective of a
26 subsequent order under the provisions of Section 1203.4 of the Penal Code allowing such person
27 to withdraw his or her plea of guilty and to enter a plea of not guilty, or setting aside the verdict
28 of guilty, or dismissing the accusation, information or indictment."

1 8. California Code of Regulations, title 16, section 1444, states:

2 "A conviction or act shall be considered to be substantially related to the qualifications,
3 functions or duties of a registered nurse if to a substantial degree it evidences the present or
4 potential unfitness of a registered nurse to practice in a manner consistent with the public health,
5 safety, or welfare. Such convictions or acts shall include but not be limited to the following:

6 "(a) Assaultive or abusive conduct including, but not limited to, those violations listed in
7 subdivision (d) of Penal Code Section 11160.

8 "(b) Failure to comply with any mandatory reporting requirements.

9 "(c) Theft, dishonesty, fraud, or deceit.

10 "(d) Any conviction or act subject to an order of registration pursuant to Section 290 of the
11 Penal Code."

12 CAUSE FOR DENIAL OF APPLICATION - CRIMINAL CONVICTIONS

13 9. Applicant is subject to disciplinary action under sections 2761(a), 2761(f), and/or 480
14 in that on or about March 13, 2000, in a criminal proceeding in Alameda County Superior Court,
15 case number 71219, Applicant was convicted of driving on a suspended license (a violation of
16 Vehicle Code section 14601.1(a)). Applicant was sentenced to three years court probation and
17 fined in the amount of \$946.00.

18 10. Applicant is subject to disciplinary action under sections 2761(a), 2761(f), and/or 480
19 in that on or about September 12, 2000, in a criminal proceeding entitled *United States of*
20 *America v. Nicole Howard* in the United States District Court for the Northern District of
21 California, Case Number CR 99-40244-01 SBA, Applicant was convicted by her plea of guilty of
22 violating 18 U.S.C. section 1029(a)(3) (access device fraud). Applicant was sentenced to 12
23 months imprisonment, supervised release for three years, 100 hours of community service, and
24 ordered to pay restitution in the amount of \$189,458.83. The circumstances of the conviction are
25 that while employed by Wells Fargo, Applicant accessed, provided and compromised account
26 information of 66 Wells Fargo customers to an unauthorized third party.

27 11. Applicant is subject to disciplinary action under sections 2761(a), 2761(f), and/or 480
28 in that on or about March 11, 2005, in a criminal proceeding entitled *People v. Nicole Mary*

Howard in the Superior Court of Marin County, California, Case Number SC137429A, Applicant was convicted by her plea of guilty of violating Penal Code section 508 (felony embezzlement). Applicant was sentenced to three years imprisonment (suspended), supervised probation for five years, and ordered to pay restitution in the amount of \$16,928.25 to Marin General Hospital, and a restitution fine in the amount of \$1,640.00. Applicant failed to comply with the terms of her probation and was imprisoned for 363 days on January 30, 2008. The circumstances of the conviction are that Applicant was employed by Marin General Hospital as a staffer in June 2000. Applicant gained access to the hospital computer, assigned herself overtime shifts, and was paid for working the extra shifts when she in fact did not work the extra shifts.

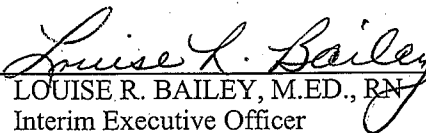
12. Applicant is subject to disciplinary action under sections 2761(a), 2761(f), and/or 480 in that on or about September 29, 2009, in a criminal proceeding in Solano County Superior Court, case number FCR260202, Applicant was convicted of driving without a license (a violation of Vehicle Code section 12500(a)). Applicant was fined in the amount of \$380.00.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Denying the application of Nicole Mary Renee Howard for a Registered Nursing License;
2. Taking such other and further action as deemed necessary and proper.

DATED: July 2, 2012


LOUISE R. BAILEY, M.ED., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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